EXHIBIT "A"

RICO STATEMENT

QUESTION #2

DEFENDANT	MISCONDUCT	BASIS OF LIABILITY
Saudi Binladin Group	Saudi Binladin Group has long provided financial support and other forms of material support to terrorist organizations including but not limited to Radical Muslim Terrorism, or the al Qaeda, and/or the International Islamic Front for the Jihad Against Jews and Crusaders. Saudi Binladin Group conducted or participated directly and/or indirectly in the conduct of the Enterprise's affairs and participated in the operation or management of the operation of the Enterprise itself. Saudi Binladin Group conspired to conduct and/or participate in the operation or management of the enterprise itself. The Saudi Binladin Group (SBG) is an international company headed by Bakr bin Laden and his brothers, Omar and, Tarek. The company is involved in all aspects of construction and other forms of commercial trade via its subsidiaries. The principal bank for SBG is the National Commercial Bank. SBG also uses ABN AMRO, al Bank al Saudi al Fransi, Arab Bank, Citibank, Gulf Investment Bank, Riyadh Bank, Saudi American Bank, Saudi Cairo Bank, and United Saudi Commercial Bank. The main business address is PO Box 8919, Jeddah 21492, Saudi Arabia. The Saudi Binladin Group (SBG), also known as the Bin Laden Corporation, founded in 1931, is focused on engineering, design, and construction of large-scale turn key projects involving highways, bridges, tunnels, airports, buildings, industrial and power plants, high rise structures, petrochemicals and mining, real estate development, and maintenance and operation. The Binladin Group has in-house capabilities for the production of a wide range of construction and building finishing materials, as well as in research and development. SBG carried out massive renovations at Mecca and Medina, the holiest sites in Islam, in the 1980s, and built the pyramid-shaped Faisaliah Center, a Riyadh skyscraper that opened last	
	the holiest sites in Islam, in the 1980s, and built the pyramid-	

SBG is one of the largest conglomerates in the Middle East today, estimated to have \$3 billion to \$5 billion in annual revenue. One financial magazine estimated its gross revenue in 1991 at \$36 billion. In 1995, SBG had 5,000 employees. The corporation has several divisions, including construction, real estate, petroleum, and a media operating division. Bakr bin Laden, one of Mohammed bin Laden's sons, currently heads the corporation. SBG's status in Saudi Arabia makes it exempt from publishing its financial records

Binladen Group International is an extension of SBG. The following is a list of their executive board members:

- -Bakr bin Laden, chairman
- -Yahia bin Laden, vice chairman
- -Omar bin Laden, president
- -Hasan bin Laden, vice president
- -Abu Baker al Hamed, managing director of public buildings and airports
- -Ahmed bin Laden, managing director of special buildings
- -Henry H.M. Sarkissian, managing director of power and industrial projects
- -Mutaz Sawwaf, managing director of architectural and interior design
- -Abu Bakr bin Alial Akhdar, managing director of petroleum, chemicals, and mining
- -Sahfiq bin Laden, board member
- -Hagop Boyadjian, board member
- -Tahsin Jarrah, board member

In addition to the activities handled directly by its divisions, the group's main holding companies are as follows (foreign subsidiaries indicated):

Construction Binladin Group

International (Egypt, Jordan, Lebanon, Malaysia, United Arab

Emirates)

Electrical engineering Binladen-Bemco

Infrastructure Mohammed Bin Laden

Organization

Real estate Project Management &

Development Co. Real

	Estate Ltd.	
Industry	Al Salem Group	
Textiles	Mimar Industrial Group (Lebanon, Great Britain, Spain)	
Clothing distribution	Casareen Contract Manufacturing (Great Britain)	
Crystal	Palwa Beleuchtungs Gmbh and Palwa Iberica (Germany, Spain)	
Publishing	Hazar Media Group (Lebanon, France, Great Britain, United Arab Emirates, Egypt)	
Maintenance	United Saudi Maintenance & Services Co.	
Distribution	GFC and Casareen Retail International (Great Britain, Malaysia, Singapore, Egypt, Lebanon, France, the United States)	
Freight/shipping	Forship Ltd. (Great Britain, France, Egypt, Canada)	
Telecommunications	Binladin Telecommunications Co.	
Public relations	Middle East International Group—MEIG AG (Switzerland)	
Since its creation, SBG has a the Saudi government, even 1968. For several years, it w contractor of the country's h		
As alleged in the Comp	plaint, SBG had, at one time,	

maintained an address in Maryland. Specifically, SBG's listing of International Offices as posted on its website in 2001 includes:

United States of America 51 Monroe Street Suite 1700 Rockville, Maryland 20850 Tel: (301) 738-8836 Fax: (301) 738-8802 Contact – Philip J. Griffin

Other addresses listed are:

Ste 400 1700 Rockville Pike Rockville, MD 30850

14530 Woodcrest Drive Rockville MD 30850

Phillip Griffin, former American consul general to Saudi Arabia, was hired by SBG as a lobbyist for the company's interests in the U.S. Phillip Griffin heads up SBG USA, which was incorporated in 1993. His address is 14530 Woodcrest Dr., Rockville, MD 20853.

SBG subsidiaries include:

Binladen Telecommunication Company is a subsidiary of SBG headed by Bakr bin Laden, Saleh bin Mahfouz, Galib bin Laden, Tahir Bawazir, and Alawi Baroum. The principal bank for the company is National Commercial Bank. The principal shareholder is listed as "Bin Laden Brothers; SEDCO". The business address listed is PO Box 6045, Jeddah 21442. Saudi Arabia.

Binladen-BEMCO Electrical and Mechanical Contracting Company Ltd. is a subsidiary of SBG headed by Bakr bin Laden, Souren Sarkissian, and Henry Sarkissian. The company has holdings in Barcelona, Houston, Toronto, and New Jersey. The principal banks for the company are al Bank al Saudi al Fransi and al Bank al Hollandi. The main shareholders are the Bin Laden Brothers for Contracting and Industry and The Saxsons Company in Lebanon. The business address listed is PO Box 3143 Jeddah 21471, Saudi Arabia.

Binladin Organization is a subsidiary of SBG located in Jeddah, Saudi Arabia. The company is headed by Salem bin Laden, Saleh Gazaz, Mohammed Bahareth, Abdullah bin Said, Mohamed Nur Rahimi, Bakr bin Laden, Tarek bin Laden, Omar bin Laden, and Yeslam bin Laden. The company's principal bankers include National Commercial Bank, Bank of America, and Saudi American Bank. The business address listed is PO Box 958, Jeddah 21421, Saudi Arabia.

SBG Construction was incorporated in the U.S. in 1996 and was headed by Simon Graves. The business address listed is 1424 E 38th Ave, Eugene, OR 97405.

SBG Construction Corporation was incorporated in the U.S. in 1972. The business address listed is 39-02 Bell Blvd, Bayside NY 00000.

Binladen USA was incorporated in the U.S. in 1988 and was headed by Khalil bin Laden. The business address listed is 15260 Ventura Blvd #1060 Sherman Oaks, CA 91403.

Binladen Aviation Inc. was incorporated in the U.S. in 1983and was headed by Gerald and Lucille Auerbach. The business addresses listed are 5609 Fairways Drive, Cibolo TX 78108 and 557 Sandau Rd., San Antonio, TX 78216.

Binladen Brothers for Construction was incorporated in the U.S. in 1980 and was headed by Sarkissian Kourken. The Business Address listed is 4815 Fm 2351, Ste 203, Friendswood, TX 775.

SBG (UK) Limited is a subsidiary of SBG. SBG (UK) Limited provides services to Northolt Investments Limited, a fellow subsidiary of SBG controlled by Annan Limited and T. Lane. The directors of Northolt Investments Limited withheld the parent companies name on the application for incorporation.

SBG (UK) Limited owns and provides services to Islay Holdings Company. Islay is the parent company of Global Administration Limited, a fellow subsidiary of SBG. A.M.A. Moawalla and T.L. Cowking are the directors for Global Administrators Limited.

Global Administration Limited is the parent company of

Symphony Advisors Limited. The company is headed by Moawalla, Cowking, and Saleh M. bin Laden. The company is registered in the Cayman Islands and is ultimately controlled by Islay.

Moawalla is also the director for SBG Financial Engineers (UK) Limited, along with Saleh M. Bin Laden. SBG is the parent company of SBG Financial Engineers (UK) Limited, which as of October of 2001 became a controlled liability of SBG (UK) Limited.

Arabian Roots, based in Jeddah, Saudi Arabia, is a subsidiary of SBG. The company is headed by Fansa Osama, Nasr al Deen Zaid, and Kamal Kassas. Their business address is PO Box 32779, Jeddah, Saudi Arabia. The main office is located on Hand Circle, Prince Sultan Street in Jeddah.

The Bin Laden Contracting Group Pvt. Ltd., in Dubai, U.A.E., is a subsidiary of SBG. The company is headed by Yahya Mohammed bin Laden, Omar bin Laden, Abu Baker Salim al Hamid, Jihad Habib, Hisham Alawii Safi, and Mohammed Saeed Mohammed al Far. The main office is located in the Bin Laden Building on Salah al Din Road in Diera, U.A.E. The business address is PO Box 1555 Deira, Dubai, U.A.E.

Binladen Saudi Marbile, LLC is a subsidiary of SBG located off Makkah Highway, Kilo 27, in Jeddah, Saudi Arabia. The company is headed by Ahmed bin Mohammed bin Laden, Waleed Samaha, Azab Abdul Aziz, Fathi Nada, and Ghalib Hajaj. The business address is PO Box 41019, Jeddah, Saudi Arabia.

Premco LLC, in Jeddah, Saudi Arabia, is a subsidiary of SBG located in the Bin Laden Industrial Area of Makkah Highway. The business address is PO Box 22404, Jeddah, Saudi Arabia.

United Construction LLC is a subsidiary of SBG located in the Bin Laden Industrial Area of Madinah Road in Jeddah, Saudi Arabia. The company is headed by Nihad al Gondi, Walled Mahadi, and Ahmed Abu Salihia. The business address is PO Box 14173, Jeddah, Saudi Arabia.

The Saudi Binladin Group is a member of the U.S.-Saudi Arabian Business Council ("USSABC"), along with Al Rajhi Banking & Investment Company, The National Commercial

Bank, Saudi American Bank (through Samba Financial Group), Al Baraka Investment & Development Corporation (through Dallah Albaraka Holding Co.), Ibrahim Mohammed Afandi (through Al-Afandi Establishment for Trade, Industry & Contracting), and Mohammed Bin Abdullah Al Jomaih (through Aljomaih holding Company). The USSABC is an "organization of business leaders in both countries working together to increase trade and investment by promoting broader understanding among U.S. and Saudi Arabian companies, as well as specific business opportunities." This group maintains offices in Washington, D.C. and Riyadh, Kingdom of Saudi Arabia.

The USSABC publishes a quarterly newsletter depicting current topics of the organization. In the 1999 issue (vol. IV, No. 3), it is noted that Defendant Saudi American Bank ("SAMBA") had conducted a series of "Saudi Arabian Economic Opportunity Roadshows" from 1997 to 1999. As a follow-up to this series, SAMBA organized a Saudi-American Companies Conference on June 25-27, 1999, in Washington, D.C. Among those that attended the conference were Dr. Fuad Rihani, Chairman's Advisor for R&D, Saudi Binladin Group and Philip J. Griffin, Vice president, Business Development and Pubic Relations, SBG-USA, Inc.

According to a May 7, 2001 press release, the U.S. Commerce Department led a Saudi delegation to the International Franchise Expo in Washington, D.C. from May 18-20. Among those that attended this conference was Dr. Fuad A. Rihani, Chairman's Advisor for R&D, Saudi Binladin Group.

Ptech, a technology company based in the U.S, lists SBG among its many clients from around the world. Ptech has been implicated as a company involved with terrorist finance and money laundering.

Ptech, the privately owned technology company, based in Quincy, Massachusetts, received at least \$20 million in financing from Saudi investors between 1994, when it was founded, and 2001. Fourteen million dollars came from Yassin Al-Qadi, who was listed as a Specially Designated Global Terrorist on October 12, 2001.

Al-Qadi was the director of the Saudi-based Muwafaq Foundation ("Blessed Relief") that fronted for, and funded,

Makhtab Al-Khidamat (MK), Al Qaeda, Hamas, and the Abu-Sayyaf organization, to name just a few. According to a Treasury Department letter to Switzerland's Attorney General in November 2001, there was "a reasonable basis to believe that Mr. Kadi has a long history of financing and facilitating the activities of terrorists and terrorist-related organizations, often, acting through seemingly-legitimate charitable enterprises and businesses."

Ptech is used primarily to develop enterprise blueprints at the highest level of US government and corporate infrastructure. These blueprints hold every important functional, operational, and technical detail of the enterprise. A secondary use of this powerful tool is to build other smart tools in a short period of time. Ptech's clients in 2001 included the Department of Justice, the Department of Energy, Customs, Air Force, the White House, the FAA, IBM, Sysco, Aetna, and Motorola.

An example is a complete blueprint of food distribution patterns, which would include food suppliers, warehouse locations, distributors, vehicles and schedules. With this knowledge, fraudulent deliveries of contaminated food would not be difficult to accomplish.

Another example is product specifications in the blueprint for Smartcards as implemented in various defense facilities. It would include enough information to provide templates for duplication, and for unauthorized production of fake Smart IDs, which are a basic tool in the arsenal of criminals and terrorists alike.

Ptech's Middle East branch called Horizons received projects directly from Ptech and is used for outsourcing projects for Ptech's US clients. Other clients come from the Middle East and include clients such as the Egyptian military, SBG, and the Afghan-based BTC BinLadin Telecom, which provided pre-paid telephone calls.

InfoCom, a computer and information technology exporting company was incorporated in Richardson, Texas in 1992. InfoCom was indicted in 2002 on charges that the company and its officers were supporting terrorism, specifically Hamas. One of InfoCom's officers, Ghassan Elashi, was also the registered agent and owner of the HolyLand Foundation for Relief and Development, a charity recently designated as a terrorist entity by the U.S. Government. The Saudi Binladin

Group lists Bayan Elashi (founder of InfoCom) and InfoCom's name and address as the Administrative/Technical contacts for their website. InfoCom also hosts websites for many other terrorist related organizations such as the World Assembly of Muslim Youth, Benevolence International Foundation, and the Global Relief Foundation.

Listed under the heading, "Exports", on SBG's website in 2001:

The products of SBG manufacturing companies located in Europe and the Middle and Far East are exported through the group's trading and distribution network to eighteen countries.

"USA" is one of the eighteen countries listed.

Executive Board members of Binladin Group International include Bakr M. Binladin, Yahia (or Yehya) M. Binladin, Omar M. Binladin, Hasan M. Binladin, and Ahmed M. Binladin. Yehia M. Binladin is also Managing Director of the Saudi Binladin Group. Yeslam Binladin is the head of SBG's European investment arm, Saudi Investment Company ("SICO"). Of these individuals, the following maintain residences in the United States:

Mohammed M. 197 8th Street

Binladen & Charlestown, MA 02129
Ahmed M. (current as of 1/26/04)

Yeheya (sic.)
Binladen

1864 Thomas Avenue
Coos Bay, OR 97420
(current as of 7/13/01)

Yeslam Binladen

Canyon Road
Los Angeles, CA 90077
(current as of 1/25/02)¹

According to SBG's 2001 website, its international division, Binladin Group International, "operates in the global market place and is responsible for all matters relating to international tenders, organizing (sic) the participation of the various SBG Operating Divisions in projects either as sole contractors, in joint venture or consortiums." During the

¹ www.intelius.com – People search for "binladin" & "binladen"

1980s and 1990s, several corporations purportedly linked to SBG and the bin Ladin family.

The Cambridge Engineering is a company the US government claims provided funds to Osama bin Laden. Cambridge shareholder, Safron Partners, registered in BVI, was managed by an associate of the SBG and Yeslam Bin Laden and several transfers from Cambridge passed through a French bank.

A U.S. Department of Justice memorandum from Ellen Warlow, Director of the Office of International Affairs at the DOJ, to a foreign government dated September 20, 2001; Subject: Urgent Request for assistance in the investigation of the terrorist attacks on the World Trade Center and the Pentagon:

Investigators believe that UBL has received funding from two accounts at Deutche Bank ... in the names of Cambridge Engineering and the Saudi Binladin Group.... The investigation thus far reflects that UBL was a shareholder in the Saudi Binladin Group and received a buyout payment....

Another foreign government memorandum indicates that \$300 million has transited through these accounts.

Yves Bruderlein is the director of Cambridge Engineering, a subsidiary of SBG. Cambridge functions as a funnel for illegal financial transactions on behalf of SBG. The following is partial transcript of an interview with Bruderlein:

It is an investment company which has overt banking accounts and which deposits credits for Saudi Binladin Group. It does not have any other activity.

Within the framework of Saudi Binladin Group, there other companies which have the same objectives as Cambridge Engineering?

There are the many, and for each one the leaders of the Binladin Group open another account to take participation or make an investment, they create an ad hoc company of

management.

I am an administrator of this company with Antoine Berthoud, who succeeded Noel Marechal, an old associate of mine who retired.

Why is this company based in the Cayman Islands?

It was a decision made at the direction of the Saudi Binladin Group's council of lawyers.

What is the commonality between Cambridge Engineering and the company Safron?

Safron has continued to create investment funds for which the goal is to invest \$100 million in various countries in the Middle East. In response to your specific question, there is no direct bond between Cambridge Engineering and Safron. The Saudi Binladin Group participated in Safron in the beginning through an intermediary, another company called Wicklow Securities Limited.

Were any attempts made at using your company by companies belonging to or dependant of Osama Bin Laden?

No, we only receive our directives from the Saudi Binladin Group.

Do you or did you have connections with the company known as Al-Taqwa Bank owned by Nada?

No. There are important transfers of several million dollars, but they are always transfers within Saudi Binladin Group or its subsidiary companies or with the profits of its leaders. I do not have notes of suspect transactions.

Basil al Rahim founded Safron Corporation which would later be investigated by the U.S. Treasury Department and have its assets frozen. Safron Corporation was a limited partner of Telecom Ventures LLC, a Virginia-based corporation. Safron was used by its partners, including SBG as a front for money laundering. The company dissolved in June of 2001. It was comprised of several subsidiaries and limited partners, including Safron Advisors UK Ltd. (headed by A.M.A. Moawalla), Safron Partners LLP, Safron Telmaroc, Safron Jumbo Partners I LLP. Below is a list of accounts held by Safron:

United Bank (Washington), 1018558 Arab Bank (London), 010050 Diners Club International, 100358777

Basil al Rahim held power of attorney on the following accounts:

Safron Partners I LLP, Deutsche Bank (Geneva), 200057600333 Safron Partners I LLP, Bankers Trust AG (Zurich), 19056.52 Safron Jumbo Partners, I LLP Bankers Trust AG (Zurich), 19999.50

Safron dissolved, but al Rahim founded MerchantBridge and Company Ltd. in London. Hassam bin Laden is the alternate director of the company. MerchantBridge now contracts with the Iraqi government, including a contract with the Iraqi Ministry of Industry and Minerals.

Basil al Rahim maintains an office in Washington D.C. at AIMCO, 2141 Wisconsin Ave. NW.

Basil al Rahim is also a senior advisor for Riggs National Bank. Riggs National Corporation ("Riggs") is a bank holding company incorporated under the laws of the state of Delaware, with its headquarters in Washington, DC. The principal subsidiary if Riggs is Riggs Bank, N.A., a nationally chartered bank. The bank operates approximately 50 branches in the Washington, DC area. Recently, Riggs was acquired by PNC Financial Services Group, Inc.

Riggs is believed to have knowingly financed charities that are suspected of financing terrorist activities. The Office of the Comptroller of the Currency (OCC) imposed fines on Riggs Bank for not reporting millions of dollars in suspicious transactions.

We find a regulator that was reportedly aware of noncompliance by Riggs with high-risk foreign clientele as far back as 1997, perhaps even earlier, and did nothing about it. We find a regulator that was slow to act, even after the September 11 terrorist attacks inside our borders made the threat posed by terrorfunding networks all too clear.

The OCC and FinCEN recently assessed a \$25 million civil money penalty against Riggs for violations of the BSA. The OCC also took a separate cease and desist action to supplement the order issued against the bank in July, 2003.

Novaya Gazeta cited several British companies involved in connection with the Russian debt and Osama bin Laden, including: Falcon Capital Management Limited, Falcon Capital Nominees Limited, Falcon Properties Ltd., Safron Advisors, Attock Oil Company Ltd., Globe Administration Ltd.

All of them have London addresses of their headquarters but none of them is in the London telephone directory. Some of them have identical addresses.

The Czech firm Falkon Capital, to which the Czech government has sold the Russian debt for \$580 million, is directly connected with terrorist Osama bin Laden.

On the basis of information which is reportedly part of classified documents which the U.S. secret services gathered for several years, bin Laden's family owns the firm Saudi Binladin Group, which is the main source of the terrorist's fortune. The group's subsidiaries allegedly include Falkon Capital, a company which the Czech cabinet recently entrusted with mediating the repayment of the Russian debt to the Czech Republic. Falkon Capital is to be paid a large part of the debt -- \$770 million.

As noted in "Plaintiffs' Memorandum of Law in Opposition to Motion of Defendants Saudi Binladin Group, Bakr Binladin, Omar Binladin and Tarek Binladin to Dismiss the Complaint or, in the Alternative, For a More Definite Statement," Ambassador Charles W. Freeman, Jr., an "expert" on Saudi Arabia, stated:

If there were ever any company closely connected to the U.S. and its presence in Saudi Arabia, it's the Saudi Binladin Group."

Freeman is also President of the Middle East Policy Council, "a Washington nonprofit concern that receives tens of thousands of dollars a year from the bin Laden family."

The Middle East Policy Council Board ("MEPC") of Directors includes, among Freeman and others, Dr. Fuad A. Rihani, Director of Research and Development, Saudi Binladin Group. According to MEPC's 2001 Form 990 filed with the IRS, Fuad Rihani remains a board member of MEPC and lists his address as 4320 4th Street Cir., NW, Hickory, NC 28601. MEPC banks with Riggs – Acct # 01 08 466 593 receives contributions to the organization.

Yassin al-Kadi is a director of Global Diamond Resources, based in Nevada. He sits on the board as a representative of New Diamond Holdings, a foreign investor firm that has a controlling interest in Global Diamond.

The board of directors for Global Diamond Resources includes Yassin al-Kadi and representatives of the bin Laden family who invested in Global Diamond Resources. Yassin al-Kadi was introduced to Global Diamond Resource's Chairman by an executive at the SBG. In regards to the company's decision to let al-Kadi join as an investor, the Chairman said, "I relied on the representations of the bin Laden family. They vouched for him."

The Bin Laden family "reportedly own extensive residential properties in Boston and the Saudi Binladin Group ("SBG") made two \$1 million gifts to Harvard University to fund endowments for the study of Islamic law and Islamic art and architecture."

According to a report in the *New Yorker* magazine in 2001, SBG has extensive international commercial ties; the company was reported to employ 32,000 people in 30 countries. Until recently, the company had a \$2 million stake in the Carlyle Group, a U.S. private equity firm with a large interest in defence contracting and substantial ties to politically-connected executives including former President

George H.W. Bush, former Secretary of State James Baker, and former British Prime Minister John Major. Although SBG has sold its stake in the Carlyle Group, it appears that it has maintained ties with other U.S. entities and that much of its banking and equity investments are handled in the United States.

The family continues to have a stake, estimated by one source at about ten million dollars, in the Fremont Group, a private investment company, on whose board of directors sits another former Secretary of State, George Shultz.

Much of the family's private banking is handled by Citigroup, which is chaired by former Treasury Secretary Robert Rubin.

The family has equity investments with Merrill Lynch and Goldman, Sachs. Among the family's business partners is General Electric. A spokesman for Jack Welch, former chairman of G.E., says that the family threw a party for him in the nineteen-nineties in Saudi Arabia, and that Welch "considers them good business partners." One American diplomat says, "You talk about your global investors, it's them. They own part of Microsoft, Boeing, and who knows what else." The family has been awarded contracts to help rebuild American military installations, including the Khobar Towers, which were damaged in a terrorist attack that killed nineteen servicemen in 1996.

The Gulf War brought the SBG more business opportunities and chances to forge ties with international corporations--ties many companies continue to defend. Citigroup and the Dutch bank ABN AMRO provide financial services to the SBG; General Electric and the bin Ladens are part owners of the Saudi Arabian Power Equipment Company(ph), and Motorola sells them telecommunications equipment.

But other companies are getting cold feet, including British paging company Multitone, which says it's suspending its business with Baud Telecommunications (ph). Company officials said they didn't realize Baud was owned by the Binladin Group. Unilever and Cadbury Schweppes, which have used Binladin subsidiaries to distribute products like Snapple and Mazola margarine in the Middle East, are pulling back. They say it has nothing to do with bad publicity, but Adil Najam says clearly Osama has been bad for business.

SBG moreover controls many charitable foundations and organizations linked to Islam and suspected of funding extremists, in the Philippines in particular.

In 1999, an audit commissioned by the Saudi royal family reportedly revealed that five leading businessmen had contributed millions of dollars to Osama Bin Ladin's terrorist networks via two NGOs, Islamic Relief and Blessed Relief. Those concerned pleaded fear of racketeering: They claimed to be avoiding attacks on their business dealings by paying the Islamic tax, the zakat, estimated at 0.2 percent of profits.

The police are investigating the shareholders and activities of the lamp company Palwa Iberica S. A., which belongs to the Bin-Ladin family through the Minar Industrial Group. The firm was based in Alacuas and Paterna (near Valencia) before moving to Barcelona. The Saudi Binladin Group currently includes Palwa Fabrica, the makers of "quality lamps", in its list of businesses..."

Just days after Syrian President Bashar Assad's "election" as president in July 2000, one of Said's companies, the First Saudi Investment Company, joined a new consortium, the Arab Investment Holding Company (AIHC), committed to investing \$100 million in Syria's mobile telephone, Internet and hotel sectors. The AIHC was apparently established for political reasons - the other three members of the consortium were Saudi Oger, owned by Lebanese Prime Minister Rafiq Hariri; the Bin Laden Group; and the Dallah Al Baraka Group, the parent company of Al Baraka Investment and Development (ABID), which US intelligence officials say was involved with Al-Qaeda.[13] Said helped build support in Britain for the new Syrian president by arranging visits to Damascus by prominent public figures, such as Vivienne Duffield, the daughter of the late Jewish multimillionaire Charles Clore.

In a document seized in Spain, World Islamic Relief Agency lists their address as PO Box 4843 in Jeddah, Saudi Arabia, the same address as SBG subsidiary Project Management and Development Company.

World Islamic Relief Agency has been indicated by the U.S. Treasury as a front organization funding Islamic jihad.

Also, Spanish authorities investigating Al Qaeda connections

to certain individuals in Spain seized documents belonging to Bassam Dalati Satut, an individual accused of being a member of the Spanish Al Qaeda cell. On one of the seized documents, Farid Quraishi is listed as the General Director of the International Islamic Relief Organization, a known Al Qaeda financing front. The address listed below Quraishi's name is P.O. Box 4843, Jeddah, Kingdom of Saudi Arabia. The same address listed on SBG's website in 2001 as that of Project Management & Development Co. Real Estate Limited, the real estate division of the Saudi Binladin Group.

According to Egyptian intelligence reports, the grant that the Bin Laden Foundation extended to those wishing to travel to Egypt reached 300 dollars a month, of which a Mujahid would receive 180 dollars from the branch of the establishment in Cairo and the rest upon leaving for Jeddah, where the Mujahideen would be received by company representatives who would take their Egyptian passports and give them other travel documents. After spending ten days at the House of Ansar, which was teaming with volunteers from Arab, Asian and Islamic countries, the Mujahideen would head directly to Jeddah International Airport to travel to the border city of Peshawar.

In Peshawar, several committees were formed, ... the Islamic seminars committee, which was headed by a succession of youths known only by their aliases, such as Abu Hajar Al-Iraqi, Abu Nidal Al-Souri, Abu Adam Al-Sudani, Abu Saffiyya Al-Yamani, Abu Hafs Al-Saudi, Abu Dust Al-Benghali and Abu Habib Al-Bahrainin and many others.

Osama bin Laden's role was not restricted to merely financing these groups. Rather, it exceeded that to the establishment of huge practical project which transformed the Jihad in Afghanistan from protracted individual effort into an organized work, for he built and established several camps, including the "Sada" camp which specialized in preliminary training before the Mujahideen could join the fighting front, and the "Hajji," camp, which tactical location he brilliantly selected between the mountains and caves to avoid Soviet raids.

News about these camps quickly spread among Arab youths throughout the Arab world, triggering an influx of large numbers of Arab and Islamic youths into Afghanistan for two primary reasons:

The first was the wide scale campaign that the Islamic Brotherhood Movement carried out in all Arab and Islamic countries to alert to the importance of the Islamic Jihad in Afghanistan and the need to mass all efforts, whether financial or physical, to secure a place in paradise, which is the prize of only those men who are martyred for the sake of God.

There were extensive campaigns among students at colleges and universities and schools to raise funds, which got to the point that some female students at Egyptian universities sold their food rations to collect money for the Afghan Jihad.

Then the money was collected and channeled through Islamic organizations and groups to the Mujahideen. ... University campuses were like beehives full of youths feeling the pain of its Islamic nation being targeted, first of all, by the communists, and secondly by the Zionists.

Salem Mohamad bin Laden, a leading Saudi businessman, is the owner and chairman of the board of several companies: founding member and member of the Board of Saudi Bank, Paris; member of the Board of Tihama for Advertising Public Relations and Marketing Research. His contributions to the Saudi economy are substantial and his vast enterprises are nation wide and world-wide. His address is listed as Sheikh Salem bin Laden Mansion, Jeddab, Saudi Arabia.

Abdul Kadir Mohammed bin Laden, another leading Saudi businessman, was born in Jeddah in 1932. He received a general education, supplemented by commercial training. He is chairman of board of Al-Fadhl Trading and Engineering Corporation; Owner-President of Trading and Shipping Agencies; Chairman of Board of Economic Development Corporation, Electronic Maintenance Services Ltd,; member of Board of al-Fadhl Ben Laden-C & P.B.R.C. al-Fadhl (Saudi) Ltd., Arabian Cement Co., al-Jazirah Bank; member of Chamber of Commerce and Industry, Jeddah, Administrative Council, Jeddah; Honorary Consul of the Republic of Sierra Leone. Hobby: study of Arabic literature and history. His address is listed as PO Box 82, Jeddah, Saudi Arabia.

Bakr Mohammed bin Laden, a Saudi businessman, was born in 1946 in Mecca, Saudi Arabia. He received his Bachelors in

Science in Civil Engineering in 1973 at University of Miami, Florida. He is the Field Project Manager for the construction division of Binladin Organization; served on the Boards of several Binladin Organization joint ventures with foreign partners; Managing Director, Binladen Organization. His address is listed as Kilo 7, Makkah Road, PO Box 968, Jeddah, Saudi Arabia.

Much speculation has been printed about the psychological dynamics within the bin Laden family; sources in the Saudi royal family have painted Osama as a stigmatized outsider, because he was the only child of a less favored, foreign-born Syrian wife. But Yeslam's estranged wife, Carmen, stated she never detected any distance between Osama and the rest of the family: "In front of me, they never disowned Osama. They spoke of him as a brother."

Dr. Saad Al Fagih, Saudi dissident living in London, and former Afghan combatant, who kept close relationship with Osama bin Laden for many years, testified that:

There's a very interesting thing in Islamic structure of the family: you are obliged to support your family members, even if they are distant members. If it's a cousin or a niece or a nephew, especially a brother, you have to support them if you are a capable person. And the people feel sinful if they don't let this money go to its real owner, in this case, Osama bin Laden.

Saad Al-Fagih claims that bin Laden's mother has twice met with her son since he moved to Afghanistan in 1996. Atwan said that a trip in the spring of 1998 was arranged by Prince Turki al-Faisal, then the head of Saudi intelligence. Turki was in charge of the "Afghanistan file," and had long-standing ties to bin Laden and the Taliban. Indeed, Osama, before becoming an enemy of the state, had been something of a Turki protege, according to his biographers. Prince Turki, Al-Fagih said, "made arrangements for Osama's mother and his stepfather to visit him and persuade him to stop what he was doing." When Al-Fagih was asked about bin Laden's response, he said:

He is very close to his mother, so he thought it was nice to see his mother. It's a free trip. He

tries not to discuss his views with his mother. They talk about health, and children. But he didn't promise anything.

The second trip, according to Al-Fagih, occurred last spring. "The royal family approved it," Al-Fagih, who is eager to turn the United States against the Saudi royal family, told me, "It was not just a family affair. It was to try to approach and influence him. They wanted to find out his intentions concerning the royal family. They gave him the impression that they wouldn't crack down on his followers in Saudi Arabia" as long as he set his sights on targets outside the desert kingdom. January 2004, the Qatar-based news network Al-Jazeera broadcast footage of what was purported to be the wedding of bin Laden's son Mohammad. Three siblings from a later marriage of Osama's mother were in attendance.

In the early 1990s, Tarek bin Laden served as the general supervisor of the International Islamic Relief Organization (IIRO), a charity that has abetted al-Qaeda. At this time, IIRO was rapidly becoming al-Qaeda's foremost charity, used as a means to transfer funds and personnel.

According to the Arabic publication, the *Muslim World League News*, Tarek bin Laden had a prominent role in 1990 at the IIRO:

Tarek bin Laden has been a member of the IIRO in MWL for ten years. He has been working quietly for the orphans and the immigrants in the Islamic world. In the past two years the operation of IIRO has grown thanks to the support of the Saudi royal family. Tarek says that the IIRO relies on donations of the Saudi people and some donations from the Islamic world. They hope to raise 100 million riyals every year in the next ten years through their project Sanabel Al-Kheer. The IIRO works in more than 45 countries.

Shaikh Tarek bin Laden, the general supervisor of IIRO, a MWL subsidiary...the Medical delegation will be for two weeks in Alexandria. Then he continues to talk about the importance of cooperation between Saudi and Egyptian doctors. Tarek also said that they

would raise money so they could open a branch of Al-Azhar University in Alexandria. Tarek also said that the IIRO has several objectives, which would be easy to obtain because the organization is non-official and it is not bound to the government. IIRO was founded in 1398 H. (1973 A.D.) so it will connect between the donors and the needed people. The most prominent project of the IIRO is Sanabel Al-Kheer.

In January of 2001, Al Jazeera network aired footage of Osama bin Laden attending the wedding of his son, Mohammad, along with other members of the Bin Laden family. At the wedding of his son, Mohammad, Osama bin Laden read a poem describing the destruction of the USS Cole as the wedding audience cheered. Among those that attended the wedding were "bin Laden's mother, two brothers, and a sister who flew to Kandahar from Saudi Arabia."

In observance of Muslim customs and beliefs, it is a family member's duty to not "spoil" their income with money that is not theirs; rather, it is their duty to ensure the rightful owner has custody of his/her money. Osama Bin Laden's large family has not completely cut him off:

The only way they guarantee [this custom] is by letting bin Laden's share reach him. Some of the brothers and sisters believed it was their religious duty to support this distinguished brother from their own money. While many are very careful not to irritate the royal family, many more do not care and insist on letting the money reach Osama.

Osama Bin Laden received extensive financing and material support from the SBG. He declared during an interview in 1997 that:

We transported heavy equipment from the country of the Two Holy Places (Arabia) estimated at hundreds of tons altogether that included bulldozers, loaders, dump trucks and equipment for digging trenches. When we saw the brutality of the Russians bombing

Mujahidins positions, by the grace of God, we dug a good number of huge tunnels and built in them some storage places and in some others we built a hospital. We also dug some roads, by the grace of God, Praise and glory be to Him, one of which you came by to us tonight.

In the introduction of his Declaration of War against the Americans in 1996, Osama Bin Laden admitted this family support:

Then in 1979, just after he graduated from King Abdul Aziz University in Jeddah with a degree in Civil Engineering, the Soviet Union invaded Afghanistan, and the Mujahideen put out an international plea for help. Osama bin Ladin responded by packing himself and several of his family's bulldozers off to Afghanistan.

The Saudi Binladen Group provided Osama bin Ladin financial assistance and engineering support in Sudanese construction projects. Various sources confirmed that the Sudanese construction company set up by Osama Bin Laden, Al Hijra for Construction and Development, was a subsidiary of the Saudi Binladen Group. This information is confirmed by an Intelligence Newsletter:

These are Wadi al Aqiq, an agricultural company with an investment arm; Al Timar Al Mubarikah, a sugar concern; Al Hijra a building and public works Company . . . an affiliate of the powerful Saudi group headed Bin Laden's father.

Osama spent the first years of the Afghan war travelling throughout Saudi Arabia and the Persian Gulf and raising millions of dollars for the jihad. Some of the funding came directly from the Saudi government, some from official mosques, and some from the kingdom's financial and business élite—including his late father's construction empire, the Bin Laden Group, which by then had interests on three continents.

After Osama bin Laden was caught smuggling weapons from Yemen in the early 1990s, Saudi Arabia stripped him of his citizenship and froze his assets in the kingdom. However, the Saudi government also supplied the Afghan Jihad with weapons and money, in light of the threat that this Soviet penetration and siege of the Gulf region represented in the invasion of Afghanistan and the extensive presence of Soviet military experts and consultants in southern Yemen at the time and Ethiopia in the south and south east in order to access Gulf oil posed. The Russian-Chinese conflict also had an impact on the fighting raging in Afghanistan, with China exporting huge caches of arms to the Mujahideen via an import/export office owned by Osama bin Laden.

Osama bin Laden obtained American made missiles in a historic deal he struck with the CIA, after having threatened to withdraw from the Jihad completely and to expose the CIA's plans to the public. The presence of this missile had become a vital necessity to confront the heavy Soviet air attacks on the positions of the Mujahideen.

The Mujahideen were keen to establish advanced military training centers under the command of some Afghan officers. These centers soon turned into actual military colleges that graduated large numbers of students. The "Islamic Party" and the Jamiyyat Islamic party established tow military colleges in which professional officers who had defected from the Afghan regular army and joined the Mujhaideen forces.

The Afghans and Soviet intelligence services manipulated Islam in the worst possible manner, for in 1985, Sheikh Abdul Rahman Al-Najjar, who is an Al-Azhar scholar, visited the capital Kabul, which was used by the Soviet media machine against the Afghan Mujahideen, and it was so strange for him to praise the agent government in Kabul and to give as a present to its minister (Anahida) a copy of the Koran in the name of Al-Azhar.

The Khad intelligence services also carried out several attempts to assassinate the leaders of the Jihad, including Abdul Rasul Sayyaf and Burhan Eddin Rabbani and Qalbuddin Hikmatyar, and even Osama bin Laden himself, and they attempted to make it look as though it was an internal conflict between the leadership of the Jihad organizations and groups. Unfortunately, this was the sad truth that unfolded after the end of the Soviet invasion and the Soviet evacuation from Afghanistan.

A Human Rights Watch report on Sudan mentioned that:

In 1990-91 Turabi (...) established a regional umbrella for political Islamist militants, the Popular Arab Islamic conference (PAIC), headquartered in Khartoum. It was formed with the immediate aim of opposing American involvement in the Gulf War. Turabi became its secretary general. Under his guidance, the Sudan government created an open-door policy for Arabs, including Turabi's Islamist associate Osama bin Laden, who made his base in Sudan in 1990-1996.

When Hassan Al Turabi took power in 1989, Sudan became an operational base for international Islamic terrorism groups, as reported by the State Department annual "Patterns of Global Terrorism" for 1991:

Terrorist and militant Moslem groups have increased their presence in Sudan. The government reportedly has allowed terrorist groups to train on its territory and has offered Sudan as a sanctuary to terrorist organizations. (...) The National Islamic Front (NIF), under the leadership of Hassan al-Turabi, has intensified its domination of the government of Sudanese President General Bashir and has been the main advocate of closer relations with radical groups and their sponsors.

Osama Bin Laden developed important building operations in Sudan since 1991 in cooperation with the National Islamic Front (NIF), headed by Hasan Al-Turabi:

He (Osama Bin Laden) embarked on several business ventures in Sudan in 1990, which began to thrive following his move to Khartoum. Bin Laden also formed symbiotic business relationships with wealthy NIF members by undertaking civil infrastructure development projects on the regime's behalf.

Among those "civil infrastructure developments projects" were the new Port Sudan Airport and the Tahaddi (challenge) road linking Khartoum with Port Sudan, as reported by the

US State Department:

Bin Laden's company, Al Hijra for Construction And Development, Ltd built the Tahaddi (Challenge) road linking Khartoum with Port Sudan, as well as a modern international Airport near Port Sudan.

Various sources confirmed that the Sudanese construction company set up by Osama Bin Laden, Al Hijra for Construction and Development was in fact a subsidiary of the Saudi Binladen Group.

Hasan Al-Turabi, himself confirmed this fact:

... [Shaykhali] Your ties with Osama Bin Ladin raise many questions. Bin Ladin stayed in Sudan for years, you harboured him, and then you kicked him out. This relationship seems suspicious. What is the truth about this relationship?

[Turabi] For those who know nothing about Saudi Arabia, Bin Ladin has the biggest family and construction company that builds roads and institutions. He came to Sudan as a branch of this company. He built the road linking Khartoum to the north, which could have been extended to reach Port Sudan. He also built the Port Sudan airport. He stayed away from the social life in Sudan. He also set up an agriculture project in Sudan. He was a struggler, and he had full US and Arab backing when he was struggling in Afghanistan. After that, he was not expelled from Sudan by the Sudanese and did not leave because he hated Sudan. He just did not want to cause an embarrassment in the relations with Saudi Arabia, which stripped him of his nationality.

The Saudi Binladin Group was present at that time on the region and for the same contracts. The Saudi Binladin Group was providing contribution to each of these public works through two subsidiaries. On the one hand, the Public Buildings and Airports Division of SBG (Saudi Binladin Group) claimed to have participated in the construction of the

Port Sudan Airport. On the other hand, Mohamed BinLadin Organization was providing a technical assistance the road construction. The Saudi Binladin Group confirmed publicly these two collaborations:

Concerning the Public Buildings and Airports Division of SBG:

Over the years the Division has undertaken various challenging projects, large and medium scale, including complete airports and roads....The projects executed include ...Port Sudan Airport.

Concerning the assistance provided by Mohamed Binladin Organization on the Sudanese road:

SBG's skills in all of these areas has been recognized and utilized in the United Arab Emirates, Jordan, Yemen and Sudan.

Indeed, an agreement for the construction of an airport in Port Sudan was signed on February 14, 1990, between the Sudanese Government and the Saudi based Binladin International Company. Engineer Siddiq Wali said that construction of the airport will take two years. He said the airport will be used as an alternative to Khartoum airport in emergency circumstances.

Siddiq Wali, engineer of the Saudi Binladin Group on the airport project, said that the total construction cost was \$39.5 million provided by the Saudi Fund, \$6 million provided by the Islamic Development Bank and \$6 millions to be raised locally by the government of Sudan.

Concerning the Port Sudan airport, several Saudi entities have promoted the Bin Ladin project:

King Fahd Bin Abd alAziz of Saudi Arabia has agreed to spend the 207m Saudi riyals which had been earmarked as aid for flood victims in Sudan on the construction of the Khartoum-Atbara-Port Sudan road. The Sudanese embassy in Saudi Arabia sent an urgent message bearing the Saudi monarch's approval. A Saudi technical delegation will arrive in Khartoum within the next two days to meet the

officials concerned.

On the basis of a study financed by the Islamic Development Bank, the Bin Ladin Company undertook the construction of the Port Sudan Airport from 1990 to 1992.

The Port Sudan Airport project and the Tahaddi road were included in the financial assistance given Saudi Arabia Government to Sudan as high as \$9.8 millions.

During that period, Osama Bin Laden stated that he was involved in the construction of the Airport and the Challenge Road linking Khartoum to Port Sudan:

I am a construction engineer and an agriculturalist. If I had training camps here in Sudan, I couldn't possibly do this job (the Challenge road) [...] personally neither I nor my brothers saw evidence of American help. When my mujahedin were victorious and the Russians were driven out, differences started [between the guerrilla movements] so I returned to road construction in Taif and Abha. I brought back the equipment I had used to build tunnels and roads for the mujahedin in Afghanistan. Yes, I helped some of my comrades to come here to Sudan after the war.

Thus, a large part of the equipments used by Al Hijra for Construction and Development, for the construction of the Tadahhi road and the Port Sudan Airport has been brought back from Afghanistan. In addition, he took back from Afghanistan thousands of Arab fighters in order to oversee these projects:

Bin Ladin's work force grew to include militant Afghan war veterans seeking to avoid a return to their own countries, where many stood accused of subversive and terrorist activities. In May 1993, for example, Bin Ladin financed the travel of 300 to 480 Afghan war veterans to Sudan...

All these human and logistical efforts were used to build civil infrastructures. The direct link between Osama Bin Laden and the Saudi Binladin Group is exemplified by the road project and the airport project.

Relationships between the three entities: Osama Bin Laden, Sudan Government and Saudi Binladin Group were stressed during the inauguration ceremony of the airport:

...Meanwhile, Osama Bin Laden, was the first guest invited to attend the inauguration of the new Port Sudan Airport. He sat in the front row and was the guest of honor in this ceremony. It was a group of Bin Ladin's companies that carried out the project of the new and modern airport that cost huge amounts of money...

...The airport was funded by the Saudi Government and was presented to Sudan by the Chairman of the Saudi Development Bank in cooperation with Omar Muhammad Bin Ladin, Osama's half brother, and Abu Bakr Al Humayd, director of Bin Ladin's group of companies in Dubai, Malaysia, Lebanon and Saudi Arabia. During the airport inauguration ceremony, Bin Laden donated \$2.5 million to establish and operate the airport, the second largest international airport in Sudan after the one in Khartoum...

Moreover, while Osama Bin Laden was constructing the Tahaddi Road with Saudi Binladin Group's technical assistance, his own company Al Hijra was headed by Muslim activists. Thus, the testimony of Jamal Ahmed al-Fahd during the 2001 trial of the 1998 African Embassy Bombings revealed the nature of Al Hijra executives in Sudan:

Q. Do you know who ran the Al Hijra Company while it was in the Sudan?

A. At the time, few people. The first one Dr. Sharif al Din Ali Mukhtar.

Q. Who else?

A. Abu Hassan al Sudani, and Abu Hamman Al Saudi, Abu Rida Al Suri and Abu Hajer.

According to this official testimony, Sharif al Din Ali Mukhtar was the principal director of Al Hijra for Construction and Development. Sharif al Din Ali Mukhtar was head of Islamic Relief Agency in Jeddah, expelled from Saudi Arabia in April 1991, and killed in chopper crash over Southern Sudan on September 1993. He was the brother of Deputy Chief of Sudanese Military Intelligence.

Other Al Hijra executives are directly involved in Al Qaeda and terrorist operations. Among them, was Abu Rida Al Suri, aka, Mohamed Bayazid. He used to provide the Al Qaeda organization in weapons.

Mandouh Mahmud Salim, was on the Al Hijra directors Iraqi national is also considered as a founding member of Al Qaeda. He was one of the Al Hijra leaders.

All these Al Hijra managers were directly involved in the construction of the Tadahhi road and in the Port Sudan airport building. Consequently, they were in connection with the Saudi Binladin Group for the two buildings operations.

The Sudanese viewed him [Osama Bin Laden] as an investor who came to support the Islamic Project, declared Dr. Hasan Al-Turabi...Financial circles in Sudan estimated the money that Bin Laden brought with him into Sudan at \$350 millions... Osama Bin Laden was a "moving bank" for the Sudanese Government. He saved the Government from many of the problems he faced.

In 1993, the Hassan Bashir government asked bin Laden for an easy loan of 80 million dollars to import flour because the flour reserves were about to run out, which would have meant a revolution of the hungry, and Osama bin Laden obliged and paid the full amount.

When Osama bin Laden stepped in to save the government, he became closer to Bashir and Turabi, which probably explains why he was seen next to Bashir at the opening of the Port Said International Airport, which was developed with Saudi government money and constructed by Osama bin Laden's company. The project was handed over in a small ceremony attended by Abdallah al-Suqeir, head of the Saudi Development Fund; and architect Omar Mohammad bin Laden, Osama's half-brother; and Abu Bakr Salem Al-Hamed, director general of the Bin Laden Group in Dubai, Malaysia, Lebanon, Egypt and Saudi Arabia.

During the ceremony, Osama bin Laden donated 3.5 million dollars to be spent on the administration and operation of the

airport,

Bin Laden says in one interview conducted in Pakistan:

I got to know three Sudanese who are members in the Islamic National Front headed by Dr. Hassan Al-Turabi, which had not reached power yet. Among then was a young man known as Al-Taher Abdul Qader, who had just graduated as engineer from the University of Khartoum. The engineer had been unemployed for a few years, so he decided to volunteer in Afghanistan, and our relationship grew closer, for Al-Taher was one of most educated and eloquent among the volunteers, and he enticed me to invest in projects in Sudan.

Then the Bashir-Turabi coup ensued in July 1989, and Osama bin Laden continued his talk about the secret behind him going to Sudan:

...and I knew at the time when the Palestinian mujahid Abdallah Azzam and his sons were martyred in car explosion in Peshawar in October 1989 by the CIA that my life was in danger, and we, the Mujahideen, felt that there were serious efforts to liquidate the symbols of the Islamic Jihad in Afghanistan with the beginning of the Soviet withdrawal from Afghanistan and that the CIA and the Egyptian intelligence had begun to turn against us and united to destroy us so that we would not reveal the secret incriminating documents we had against them.

Relationships between the three entities: Osama bin Laden, the Republic of Sudan, and the Saudi Binladin Group were stressed during the inauguration ceremony of the Port Sudan airport:

Meanwhile, Osama Bin Laden, was the first guest invited to attend the inauguration of the new Port Sudan Airport. He sat in the front row and was the guest of honor in this ceremony. It was a group of Bin Ladin's companies that carried out the project of the

new and modern airport that cost huge amounts of money.

Moreover, while Osama Bin Laden was constructing the Tahaddi Road with Saudi Binladen Group technical assistance, his own company Al Hijra was headed by Muslim activists.

Other Al Hijra executives were directly involved in Al Qaeda and terrorist operations. Among them, was Abu Rida Al Suri, aka, Mohamed Bayazid. He used to provide the Al Qaeda organization in weapons.

Additionally, Mandouh Mahmud Salim, was on the Al Hijra directors Iraqi national is also considered as a founding member of Al Qaeda. He was one of the Al Hijra leaders.

All these Al Hijra managers were directly involved in the construction of the Tadahhi road and in the Port Sudan airport building. Consequently, they were in connection with the Saudi Binladin Group for the two buildings operations.

Several members of the Bin Laden family met in Cannes, France, on September 13, 2001 and again on September 15, 2001. According to the French police, a meeting took place on September 13, 2001 with Yeslam and Bakr Bin Laden. On September 15, 2001, Yeslam and Bakr Bin Laden also attended a meeting in the same city with Mahran Ahari and Mohamed Zayani. Bakr Bin Laden was carrying a diplomatic passport.

Before September 2001, Yeslam Bin Laden was Chairman and principal shareholder of Avcon Business Jets, a Swiss airline company. In 2001, Yeslam Bin Laden paid the expenses for a flight training session believed to have taken place at Huffman Aviation in Venice, Florida, to Philippe Acharoque, born September 2, 1947, former Chief of the Police de l'Air et des Frontières – PAF - (Customs services) in Cannes, France. Similarly, Yeslam Bin laden also paid expenses for flight training at Tucson, USA, for another pilot, Pietro del Rosso.

An account was opened by Omar Mohamed A. Bin Laden and Haider Mohamed A. Bin Laden at UBS Bank in Geneva on August 17, 1990 (account # CO-565167) for their brother Osama Bin Laden. They both gave the address of the Saudi

Binladin Group (SBG) in Jeddah, Saudi Arabia, to open the account (Po Box 958, Jeddah, Saudi Arabia). The authorized persons on the account were Yeslam Mohamed A. Bin Laden and Osama Mohamed A. Bin Laden. Osama Bin Laden was authorized to use the account only with the co-signature of Yeslam Bin Laden. The named economic beneficiary of the account was Osama Bin Laden. An amount of \$450,000 US was transferred to the account on August 20, 1990. On October 25, 1991, an amount of \$482,000 US was transferred to the Saudi American Bank in Jeddah in favor of Haider Mohamed Bin Laden. The account was closed on October 9, 1997.

In the days after September 11, 2001, the US Department of Justice issued a request for assistance on several cases related to terrorism financing. Among the issues that needed to be dealt with was the fact that Osama Bin Laden had received funds from two accounts at Deutsche Bank in Geneva, Switzerland, in the names of Cambridge Engineering and the Saudi Binladin Group (SBG). An amount of \$300 million US was believed to have been transferred through these accounts. It was believed that the account was managed by Yeslam Bin Laden. Cambridge Engineering Systems Ltd has been registered by Yahia and Shafiq Bin Laden, along with Akber Moawalla (a.k.a. Akberali Mohammed Ali Moawalla). Akber Moawalla, a former treasurer and CFO of the Saudi Binladin Group, is managing Falcon Ltd, a financial holding of the Bin Laden family registered in the Cayman Islands and owned by Fawzia, Ibrahim, Khalil and Yeslam Bin Laden. Falcon Ltd. was the holding of SICO (Saudi Investment Company).

Contrary to his public statements denying any relationship between his companies and the Saudi Binladin Group, Yeslam Bin Laden's company SICO (Saudi Investment Company) received \$10,000,000 from the Saudi Binladin Group in management funds in the 90s.

In addition to SICO, Yeslam Bin Laden owns a company registered in the Netherlands Antilles, Moree Investment Limited. The company was used by Yeslam Bin Laden to move money from SICO through French a bank, Crédit Commercial de France (CCF). Funds transferred to Moree Investment Limited were then transferred to a Saudi company, Saudi Marketing and Trading Co, owned by the family of Mohammed Al Attas, second husband of Alya Bin Laden, mother of Osama Bin Laden. In 2002, French

financial judge Renaud Van Ruymbeke opened a preliminary judicial investigation on these transfers for alleged money laundering.

Yeslam Binladin, meanwhile, has issued a statement denouncing his half brother Osama; he has told reporters that his real passions are tennis and flying. He has nonetheless attracted the scrutiny of Swiss and American investigators because of a financial stake he has in a Swiss aviation firm. By a seeming coincidence, he paid for flight instruction for an acquaintance at Huffman Aviation, the training school in Venice, Florida, that many of the suicide hijackers attended. When Yeslam was asked about this, he replied that while he had subsidized the flying lessons, he was not involved in picking the flight school. He said that he has had no contact with his half brother for more than twenty years, has never supported him either politically or financially, and has not been back to Saudi Arabia for thirteen years. "As you know," he said, "I come from a large family, where my father had several wives. Every wife had her own house and lived with her own children. He and I do not come from the same mother."

SBG sheltered directly active members of terrorist organizations. Mohammad Jamal Khalifa, known to be a key figure in the network of Osama Bin Laden, was convicted by a US district court as being a central figure in several terrorist plots. Khalifa has been taken in by a branch of Saudi Binladin Group, called Mohammed Binladin Organization which is headed by various Osama Bin Laden brothers. Indeed, during his arrest, police officials found on Khalifa a visa with address of the Mohamed Binladin Organization. The address mentioned by Mohammad Jamal Khalifa is in fact the registered address of Mohamed Binladin Organization: Binladin Co., PO Box 958, Jeddah.

Mohammed Binladin Organization, a wholly-owned subsidiary of the Saudi Binladin Group, specializes in road construction and declared having participated in such works in Sudan. The company board members include, Saleh Gazaz, Mohamed Bahareth, Abdullah Bin Said, Mohamed Nur Rahimi, Bakr M Binladin, Tarek M Binladin, Omar M Binladin, and Yeslam M Binladin.

When Mohammed Jamal Khalifa, Osama bin Laden's brother-in-law, applied to come into the United States in

1994, he listed on his visa application that his address was "Bin Laden Co" in Saudi Arabia. Khalifa has subsequently been implicated by the United States for aiding numerous al-Qaeda plots and operatives, including aiding the masterminds behind the first World Trade Center bombing.

In the mid-to-late 1990s, officials from the U.S. government began focusing on Al Qaeda's financing network. After reviewing available intelligence, "[o]ne thing was clear: a lot of money being raised was coming from people in Saudi Arabia." Based on this fact, the officials planned to visit Saudi Arabia in an effort to obtain cooperation and additional information on terrorist financing. William Wechsler paid the Saudis a visit in 1995, followed by Richard Newcomb in 1998:

Despite Saudi promises to provide additional information and support, little was forthcoming in the months after the visit[s]. The Saudis protested [the] focus on continuing contacts between Osama and his wealthy, influential family, who were supposed to have broken all ties with him years before. 'How can we tell a mother not to call her son?' [the Saudis] asked.

Saudi Binladin Group has thereby knowingly, for a period of many years, provided critical financial and logistical support to al Qaeda, and/or Radical Muslim Terrorism, and/or the International Islamic Front for the Jihad Against Jews and Crusaders, to support the terrorist organization's global jihad. The September 11th Attack was a direct, intended and foreseeable product of the aforementioned Saudi Binladin Group's participation in the jihad campaign for al Qaeda, and/or Radical Muslim Terrorism, and/or the International Front for the Jihad Against Jews and Crusaders.